

SDMS US EPA REGION V -1

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MAY 23 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SM-5J

RECEIVED

MAY 29 1997

IEPA/DLPC

Mobil Oil Corporation
150 East 42nd Street
New York, NY 10017

Re: Request for Information Pursuant to Section 104(e) of CERCLA
for the Sauget Areas I and II Pre-National Priorities List
Superfund sites, in Sauget/Cahokia, Illinois

Dear Sir or Madam:

This Agency is conducting an investigation of the release or
threatened release of hazardous substances at Sauget Areas I and
II Pre-National Priorities List Superfund sites, in
Sauget/Cahokia, Illinois.

The following parameters describe the boundaries of the Sauget
Areas I and II Sites, hereinafter, referred to as the Sauget Area
"sites":

The Sauget Area I Site is an aggregation of landfills and
surface impoundments including and lying on either side of
Dead Creek in Sauget and Cahokia, Illinois. The Sauget Area
II Site is an aggregation of landfills and lagoons between
the Mississippi River and Illinois Route 3 in Sauget and
Cahokia, Illinois. A map specifying the boundaries of
Sauget Area Sites I & II is enclosed as Attachment 3.

The United States Environmental Protection Agency (U.S. EPA)
believes that you may have information that is relevant to the
investigation of contamination at the sites and asks that you
provide information and documents relating to the contamination
of the sites. Please respond completely and truthfully to this
Information Request and its questions in Attachment 4 within
thirty (30) days of your receipt of this letter. Instructions
for completion of this response letter are in Attachment 1,

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definitions of terms used in this Information Request are in Attachment 2.

Among other authorities, the federal **Superfund** law (the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601, et seq., commonly referred to as **CERCLA** or **Superfund**) grants the Agency the authority to: 1) assess the nature and extent of contamination at a site; 2) determine the threats to human health and the environment posed by a site; 3) implement actions to clean up those sites; and 4) determine the ability of potentially responsible parties to pay the costs of the clean-up. The Agency is requesting the information and documents specified herein pursuant to section 104(e)(2) of CERCLA, 42 U.S.C. § 9604 (e)(2). CERCLA Section 104(e) grants the Agency authority to gather information relevant to site(s) and to enforce compliance with the statute, including seeking penalties for failure to comply.

You may consider some information that we request as confidential. If you wish to assert a privilege of business confidentiality, you must both respond to the question and advise the U.S. EPA that you wish it to treat the response as confidential business information. Directions for asserting a claim of business confidentiality are in Attachment 5.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

Your response to this Information Request should be mailed to:

U.S. Environmental Protection Agency
C/O Carlton D. Cuffman
77 W. Jackson Blvd. - SM-5J
Chicago, IL 60604-3590

If you have any technical questions, contact Leah Evison, Remedial Project Manager at (312) 886-4696. For legal questions, contact Thomas Martin, Office of Regional Counsel at (312) 886-4273. Address all other questions to Carlton D. Cuffman at (312) 353-9181.

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We appreciate your effort to respond fully and promptly to this Information Request.

Sincerely,

Thomas W. Mateer, Chief
Program Management Branch

Attachments: 1. Instructions
2. Definitions
3. Map of Sauget
4. Information Requests
5. Confidential Business Information
6. Site History
7. Photos

bcc: Leslie Kirby, CS-29A
Leah Evison, SR-6J
Thomas Martin, CS-29A
Paul Takacs, IEPA

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ATTACHMENT 1

INSTRUCTIONS

1. Answer each question in this Information Request separately.
2. Precede each answer with the number of the question to which it corresponds.
3. In answering each question, identify all persons and contributing sources of information.
4. Although the U.S. EPA seeks your cooperation in this investigation, CERCLA requires that you respond fully and truthfully to this Information Request. False, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law. Section 104 of CERCLA, 42 U.S.C. Section 9604, authorizes the U.S. EPA to pursue penalties for failure to comply with that Section, or for failure to respond adequately to requests for submissions of required information.
5. You must supplement your response to U.S. EPA if, after submission of your response, additional information should later become known or available. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify U.S. EPA as soon as possible.
6. For any document submitted in response to a question, indicate the number of the question to which it responds.
7. Except when a particular question specifies otherwise, all requested information should be provided relevant to the time period 1950 to 1985.
8. You must undertake a diligent record search and interviewing process with all present and former employees who have knowledge or information relating to questions asked in this Information Request.
9. Your response should be accompanied by a notarized affidavit stating that a diligent interviewing process and record search has been completed. In lieu of a notarized affidavit, you may submit the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system,

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those persons directly responsible for gathering the formation, the information submitted is, to the best my knowledge and belief, true, accurate, and mplete. I am aware that there are significant alties for submitting false information, including e possibility of fines, and imprisonment for knowing olations.

of the requested documents have been transferred to or have otherwise been disposed of, identify each e, the person to whom it was transferred, describe umstances surrounding the transfer or disposition, e the date of the transfer or disposition.

ested information must be provided notwithstanding ible characterization as confidential information or ecrets. If desired, you may assert a business atiality claim by means of the procedures described hment 5.

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ATTACHMENT 2

DEFINITIONS

1. As used in this Information Request, words in the singular also include the plural and words in the masculine gender also include the feminine and vice versa.
2. The term **"person"** as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.
3. **"The Sauget Area Sites"** or **"the sites"** shall mean and include the cross-hatched properties within the boundaries of "Areas 1 and 2," including Dead Creek, located in Sauget and Cahokia, Illinois, as designated in Attachment 3.
4. The **"facility"** shall mean the Superior Equipment Company operations located at 3279 to 3283 Ivanhoe Avenue, St. Louis, Missouri, 63139.
5. The term **"hazardous substance"** shall have the same definition as that contained in Section 101(14) of CERCLA, including any mixtures of such hazardous substances with any other substances, including petroleum products and production waste.
6. The term **"release"** shall have the same definition as that contained in Section 101(22) of CERCLA, and means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
7. The term **"identify"** means, with respect to a natural person, to set forth the person's full name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

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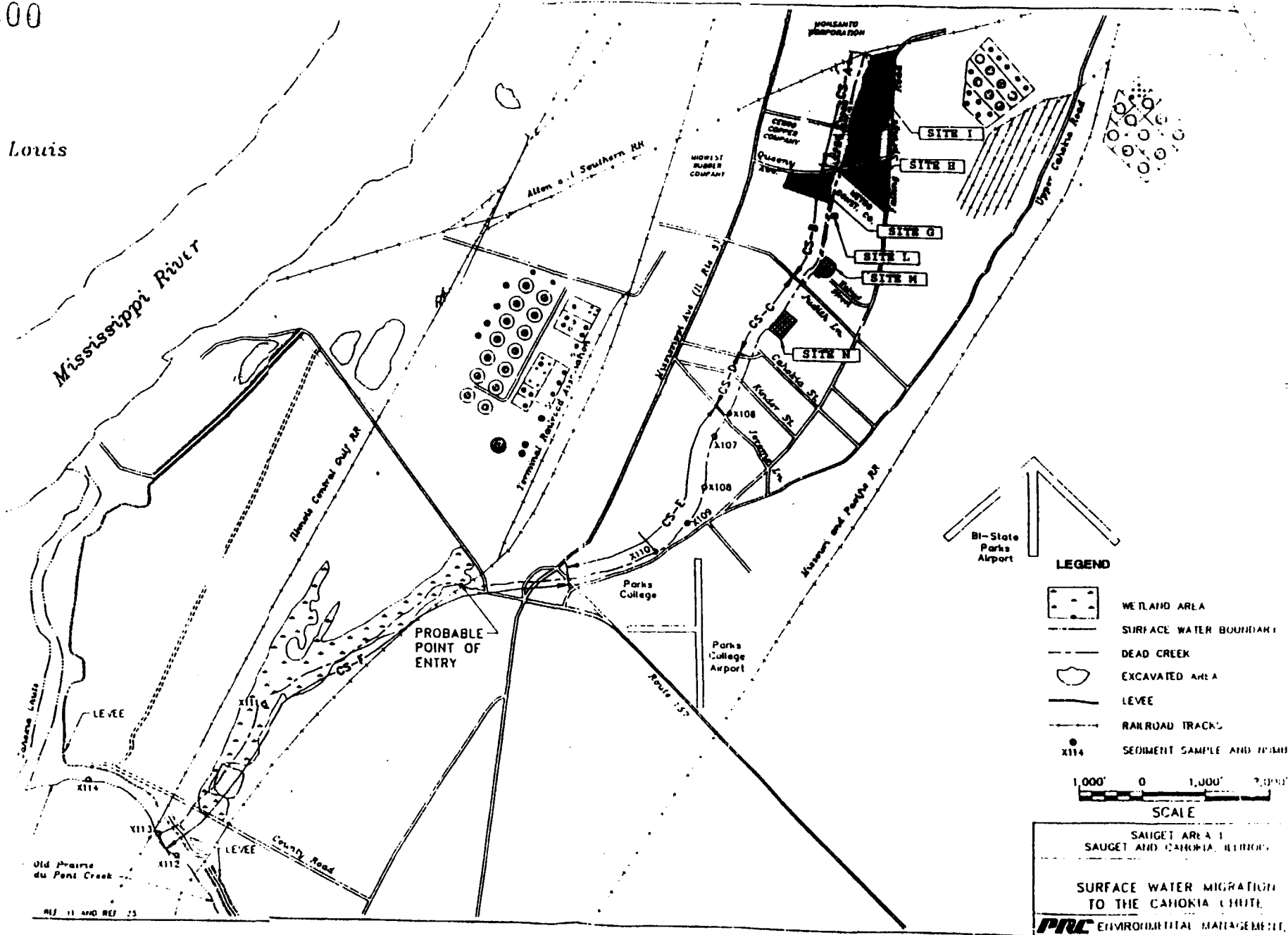
8. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth it's full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.
9. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to container for temporary or permanent holding of such wastes.
10. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.
11. The term "by-product" means a material that is not one of the primary products of a production process and is not solely or separately produced by the production process, for example process residues, slags, or distillation column bottoms.
12. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter of any kind, including, but not limited to, all hazardous substances, pollutants and contaminants, hazardous wastes, solid wastes, as defined above.
13. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Part 260-280, in which case the statutory or regulatory definitions shall apply.

ATTACHMENT 3. SITE MAPS

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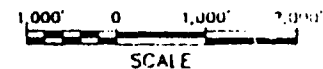
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LEGEND

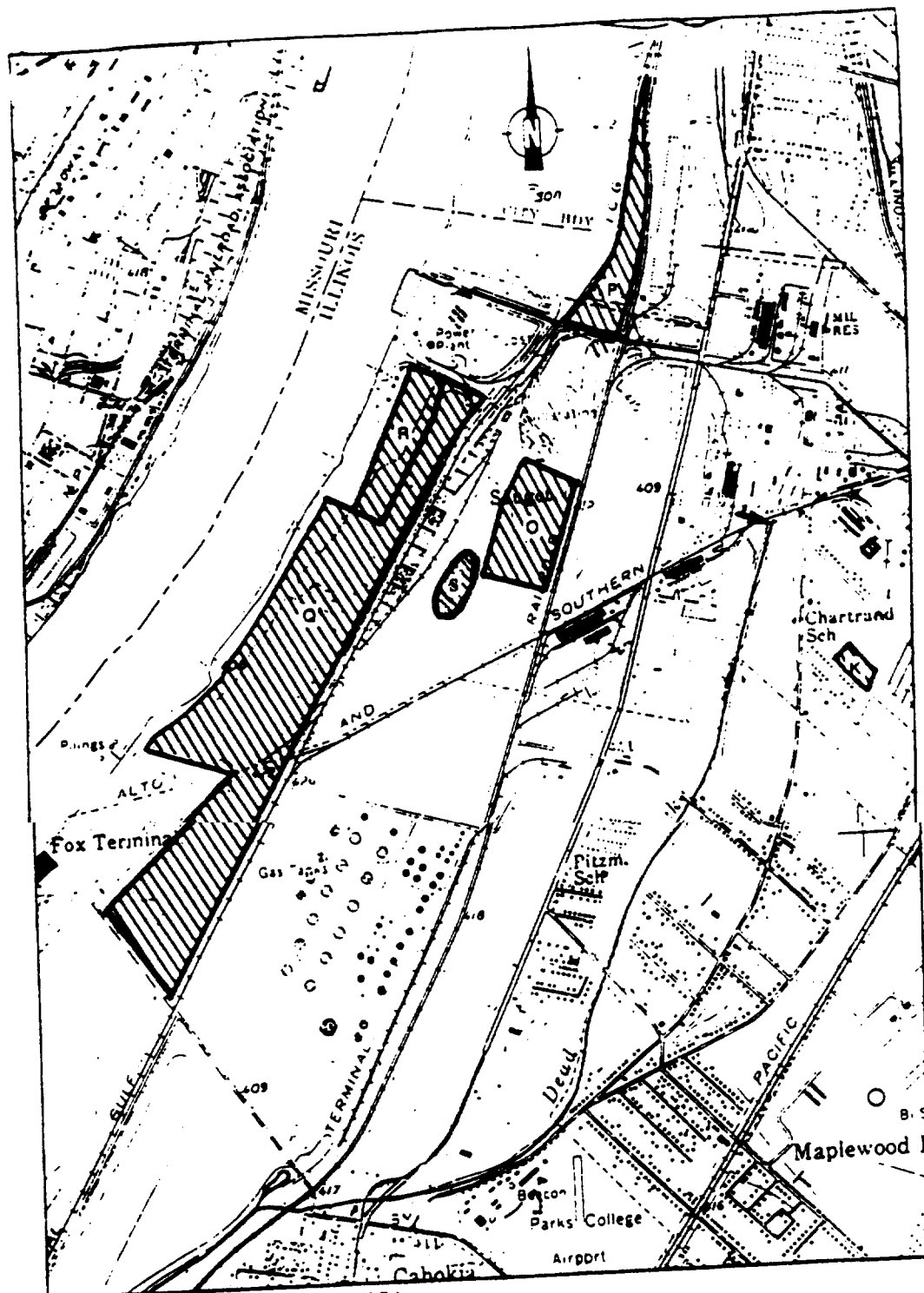
- WETLAND AREA
- SURFACE WATER BOUNDARY
- DEAD CREEK
- EXCAVATED AREA
- LEVEE
- RAILROAD TRACKS
- SEDIMENT SAMPLE AND POINT



SAUGET AREA 1
SAUGET AND CAHOKIA, ILLINOIS

SURFACE WATER MIGRATION
TO THE CAHOKIA MOUNDS

PRC ENVIRONMENTAL MANAGEMENT



SOURCE: USGS Cahokia Quad, 1974.

SCALE

0 0.5 1 MILE

SAUGET AREA 2

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ATTACHMENT 4

INFORMATION REQUESTS

Sauget Areas I and II Pre-National Priorities List
Superfund Site

1. Identify all persons consulted in the preparation of the answers to this Information Request.
2. Identify all documents consulted, examined, or referred to in the preparation of the answers to this Request, and provide copies of all such documents, clearly indicating on each document the questions to which it is responsive.
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons and where they can be contacted.
4. List the EPA Identification Numbers for the facility.
5. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances at Sauget Area Sites or at the facility during the time period specified in the instructions.
6. Identify the acts or omissions of any person, including employees, contractors, or agents, that caused or may have caused the release or threat of release of hazardous materials from the facility, as well as, any damages resulting therefrom.
7. Describe in detail the Superior Equipment Company's operations in Cahokia and Sauget, Illinois for the time period between 1900 and 1982. Identify all persons, including yourself, who have arranged or may have arranged for disposal, treatment, discharge, release, or arranged for transportation for disposal or treatment, of hazardous materials (specifically, organic wastes or products accepted by Superior Equipment) at or to any Sauget Area Site, with particular attention to persons who performed these duties. For each arrangement for

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disposal, treatment, storage, release, or transportation for disposal, treatment or release, identify the following:

- a. the persons from whom you or such other person(s) made such arrangements, including all transporters used;
- b. each date on which such arrangements took place during the relevant time period between 1900 and 1982;
- c. for each transaction, the nature of the material, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the material was used or the process which generated the material;
- d. the owner of the materials so accepted or transported;
- e. the quantity of the materials involved (weight or volume) in each transaction and the total quantity for all transactions;
- f. all tests, analyses, and analytical results concerning the materials;
- g. the person(s) who selected the Site as the place to which the materials were to be transported;
- h. the amount paid in connection with each transaction for transport or disposal, method of payment, and identity of the person from whom payment was received;
- i. whether the person(s) identified in g., above, intended to have such materials transported and all evidence of this intent;
- j. whether the materials involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;

- k. what was actually done to the materials once they were brought to the Site;
 - l. the final disposition of each of the materials involved in such transactions;
 - m. the measures taken by you to determine the actual methods, means, and site of treatment or disposal of the materials involved in each transaction; and
 - n. the type and number of containers in which the materials were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;
8. Provide all documents relating to volumes or characteristics of organic or inorganic wastes or products accepted by Superior Equipment Company from companies in Cahokia or Sauget, Illinois for any information asked in Information Request 7.
9. Has is ever been a practice at Superior Equipment Company to dispose of any wastes or products accepted by Superior Equipment Company into Dead Creek? If so, please respond to each part of Information Request 7, parts a to n.
10. Has Superior Equipment or any other person working with you or on your behalf ever accepted waste materials or hazardous substances for transportation to any portion of the Sauget Area 1 Site from Mobil or any person. If so, please respond to each part of Information Request 7, parts a to n.
11. Provide a detailed listing of products, including by-products, manufactured or produced at the facility in St. Louis.
12. Describe the manufacturing and recycling processes at the facility.
13. Specifically, identify which of the following chemicals or chemical trade names were ever used or purchased, produced or stored at the facility? (See Attachment 7, photo numbers 40, 65, 66, & 72).

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